

**Pennsylvania Department of Environmental Protection**

Lee Park, Suite 6010  
555 North Lane  
Conshohocken, PA 19428

June 14, 2000

**Southeast Regional Office**

610-832-6012  
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Mr. Orlando Monaco  
Naval Facilities Engineering Command (NAVFACENGCOM)  
Northern Division  
Environmental Contracts Branch, Mail Stop No. 82  
10 Industrial Highway  
Lester, PA 19113

Re: Warminster Naval Air Development Center  
NPL Site  
Warminster Township  
Bucks County  
Record of Decision, Operable Unit 7  
Letter of Concurrence

Dear Mr. Monaco:

The Record of Decision (ROD) dated June 2000, for Operable Unit 7 (OU 7), which pertains to soil and waste at Sites 6 and 7, Warminster Naval Air Development Center (the Site), has been reviewed by the Commonwealth of Pennsylvania's Department of Environmental Protection (Department).

The main components of the OU 7 work, as described in the ROD are:

1. This ROD pertains to the soils and wastes at Sites 6 and 7, one of several Areas of Concern (AOCs) at the Site that have been investigated during the last several years. The groundwater at Sites 6 and 7 is addressed under an Interim ROD for OU 1 (1993), and a Final ROD will be issued in the future. Surface water and sediment associated with Sites 6 and 7 are being addressed under the RI/FS for Site 5, adjacent to the subject Sites.
2. Based on results of the RI work at Sites 6 and 7, a removal action was conducted in May through July 1997. The action included removal of surface rubble, and approximately 3,698 tons of soil and debris from discrete portions of the site. Post removal sampling confirmed that the cleanup goals for the removal were met.
3. A final RI report was issued for soils and waste at Sites 6 and 7 in November 1999. This report characterized the site conditions after the removal action. There are known areas where wastes remain in place.
4. Soil and waste associated with Sites 6 and 7 do not include any source materials constituting a principal threat as defined by the NCP.



Mr. Orlando Monaco

- 2 -

June 14, 2000

5. The reasonably anticipated re-use is recreational. Residential use of the property is not reasonably anticipated.
6. The human health risks associated with potential exposure to soils and waste at Sites 6 and 7 have been evaluated as part of the RI.
7. Future recreational and residential exposures were studied for both surface and subsurface soils. There is a great deal of uncertainty in the non-carcinogenic analyses due to the lack of chromium speciation data; the assessments were done with the very conservative assumption that all of the chromium detected was hexavalent. Chromium is a major driver for all of the non-carcinogenic risks reported below:
  - a. There are no exceedances of the EPA's acceptable range for either carcinogenic or non-carcinogenic risks in the surface soil for the recreational land use. For a possible residential use, there are no exceedances of the carcinogenic risk range for surface soils; however, the non-carcinogenic risk for residential child and adult both are greater than one.
  - b. For subsurface soils, the risk assessment was calculated two ways: the first was for sitewide soils, and the second for specific zones where samples indicated waste materials were left in place, at an average of 8 feet below ground surface.
    - i. Site-wide recreational use, assuming that subsurface soils became surface soils, poses no increased carcinogenic risks above EPA's acceptable target range. The non-carcinogenic risk for both child and youth recreational users are both greater than one; also assuming subsurface soils were raised to the surface.
    - ii. For the three specific zones selected for assessment, there were no exceedances of EPA's acceptable risk range for carcinogenic risks. There are exceedances of non-carcinogenic risk ranges for recreational child and youth for each of the three zones.
    - iii. For site-wide residential use, there are no exceedances of the EPA's acceptable carcinogenic risk range. The cumulative non-carcinogenic risks for both adult and child are greater than 1.0.

Mr. Orlando Monaco

- 3 -

June 14, 2000

The selected remedy for the Site includes the following major components, as specified in the selected remedy of the ROD:

1. Placing and maintaining a 2-foot vegetated soil cover over site-wide subsurface soils.
2. Institutional controls to ensure the maintenance of the soil cover and to control excavation.
3. Monitoring to ensure the cover is maintained and the institutional controls are implemented as planned.
4. Institutional controls shall also be implemented to prohibit residential use and prevent industrial/commercial use, without Navy and/or EPA approval of a risk assessment for such use.

The Department hereby concurs with the remedy selected for the Warminster Naval Air Development Center NPL Site OU 7 for the following reasons and with the following conditions:

Pennsylvania's Land Recycling and Environmental Remediation Standards Act, Act 2 of 1995, 35 P.S. Sections 6026.101 – 6029.909 ("Act 2"), Pennsylvania's Solid Waste Management Act, Act 97 of 1980, as amended, 35 P.S. Section 6018.101 et seq. ("Act 97"), and the regulations adopted pursuant to these statutes are ARARs for this response. Implementation of any component or components of this response will not necessarily result in protection from liability pursuant to Act 2 for any party.

This concurrence with the selected remedial actions is not intended to provide any assurance pursuant to CERCLA Section 104(c)(3), 42 U.S.C. Section 9604(c)(3).

The Department reserves its rights and responsibilities to take independent enforcement actions pursuant to state and federal law.

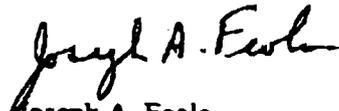
Mr. Orlando Monaco

- 4 -

June 14, 2000

This letter documents the Department's concurrence with the remedies selected by the Navy in the ROD for OU 7 for the Warminster Naval Air Development Center NPL Site. If you have any questions regarding this matter, please feel free to contact me at the above telephone number.

Sincerely,



Joseph A. Feola  
Regional Director  
Southeast Regional Office

cc: Mr. Fidler  
Mr. Beitler  
Mr. Danyliw  
Mr. Hartzell  
Mr. Sheehan  
Ms. Tremont  
Ms. Flipse  
Re 30 (GJC00)173-2